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April 11, 2023

VIA ECF

The Honorable Lewis A. Kaplan
 United States District Court
 Southern District of New York
 United States Courthouse
 500 Pearl Street
 New York, New York 10007

Re: *United States v. Samuel Bankman-Fried, S5 22 Cr. 673 (LAK)*

Dear Judge Kaplan:

On behalf of our client, Samuel Bankman-Fried, we respectfully submit this letter to request a one-week enlargement of time to implement certain specific bail conditions set forth in the Court's March 28, 2023 order (the "Order") (ECF No. 118). The defense previously requested a one-week extension on April 4, 2023, which the Court granted. (ECF No. 122). The Government consents to this second request.

Over the past two weeks, the defense has been able to implement all of the bail conditions set forth in the Order, with one exception: the conditions related to the cellphones used by Mr. Bankman-Fried's parents. The defense recently received new cellphones for Mr. Bankman-Fried's parents installed with the monitoring software specified in Appendix 1. Our technical consultant has now tested the phones and it appears that the monitoring software cannot, in fact, automatically photograph the device's user every five minutes as required by the Order. Accordingly, we respectfully request the Court to grant a one-week extension of the deadline to implement the bail conditions related to the parents' cellphones so that the defense can find different monitoring software that will conform to the requirements of the Order.

In the meantime, we respectfully request that Mr. Bankman-Fried's parents be permitted to use their existing cellphones. Attached to this letter are declarations, signed by the parents, in which they represent that they will not permit Mr. Bankman-Fried to access their electronic devices, as required by the Order.

Finally, we note that our technical consultant has been able to configure Mr. Bankman-Fried's new laptop according to the specifications in the Order and Appendix 1. However, the security software that is required to access the AWS Database is interfering with the other approved functions of the laptop, which is impacting Mr. Bankman-Fried ability to use the laptop

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productively. Our technical consultant is working on this problem, and we are hopeful that he will find a solution. If he is unable to resolve the problem, however, we may return to the Court to seek an additional modification of the bail conditions.

Respectfully submitted,

/s/ Christian R. Everdell

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cc: All counsel of record (via ECF)